IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

ART VAN FURNITURE, LLC, et al.,1

Debtors.

ALFRED T. GIULIANO, in his capacity as Chapter 7 Trustee of Art Van Furniture, LLC, *et al.*,

Plaintiff,

VS.

GATHERCRAFT LLC,

Defendant.

Chapter 7

Case No. 20-10553 (CSS)

(Jointly Administered)

Adv. Proc. No. 22-50191 (CSS)

CERTIFICATION OF COUNSEL REQUESTING ENTRY OF ORDER APPROVING STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO ANSWER THE COMPLAINT

The undersigned hereby certifies as follows:

1. On April 7, 2020, Alfred T. Giuliano, was appointed as the chapter 7 trustee (the "Trustee") of the Debtors' bankruptcy estates. On March 1, 2022, the Trustee filed the Complaint for Avoidance and Recovery of Preferential Transfers Pursuant to 11 U.S.C. §§ 547 & 550 (the "Complaint") with the U.S. Bankruptcy Court for the District of Delaware (the "Court") against defendant Gathercraft LLC (the "Defendant" together with Plaintiff, the "Parties").

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Art Van Furniture, LLC (9205); AVF Holding Company, Inc. (0291); AVCE, LLC (2509); AVF Holdings I, LLC (2537); AVF Holdings II, LLC (7472); AVF Parent, LLC (3451); Levin Parent, LLC (8052); Art Van Furniture of. Canada, LLC (9491); AV Pure Sleep Franchising, LLC (8968); AVF Franchising, LLC (6325); LF Trucking, Inc. (1484); Sam Levin, Inc. (5198); and Comfort Mattress LLC (4463).

- 2. The Parties have agreed and entered into a stipulation, subject to this Court's approval, to extend the Defendant's time to answer the Plaintiff's Complaint. Attached hereto as **Exhibit A** is a proposed form of order approving the stipulation. The stipulation is attached as Exhibit 1 to the proposed form of order.
 - Accordingly, the Parties request that this Court enter the proposed form of order. 3.

Dated: March 31, 2022 PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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